

U.S. Department of Justice

Washington, DC 20530

**Supplemental Statement****Pursuant to the Foreign Agents Registration Act of 1938, as amended**For Six Month Period Ending 12/31/18

(Insert date)

**I - REGISTRANT**

1. (a) Name of Registrant

(b) Registration No.

Bryan Cave Leighton Paisner LLP

6356

(c) Business Address(es) of Registrant

1155 F Street NW

7th Floor

Washington, DC 20004

2. Has there been a change in the information previously furnished in connection with the following?

(a) If an individual:

(1) Residence address(es) Yes ☐ No ☐(2) Citizenship Yes ☐ No ☐(3) Occupation Yes ☐ No ☐

(b) If an organization:

(1) Name Yes ☐ No ☒(2) Ownership or control Yes ☐ No ☒(3) Branch offices Yes ☐ No ☒

(c) Explain fully all changes, if any, indicated in Items (a) and (b) above.

**IF THE REGISTRANT IS AN INDIVIDUAL, OMIT RESPONSE TO ITEMS 3, 4, AND 5(a).**3. If you have previously filed Exhibit C<sup>1</sup>, state whether any changes therein have occurred during this 6 month reporting period.Yes ☐ No ☒If yes, have you filed an amendment to the Exhibit C? Yes ☐ No ☐

If no, please attach the required amendment.

<sup>1</sup> The Exhibit C, for which no printed form is provided, consists of a true copy of the charter, articles of incorporation, association, and by laws of a registrant that is an organization. (A waiver of the requirement to file an Exhibit C may be obtained for good cause upon written application to the Assistant Attorney General, National Security Division, U.S. Department of Justice, Washington, DC 20530.)

## 4. (a) Have any persons ceased acting as partners, officers, directors or similar officials of the registrant during this 6 month reporting period?

Yes ☒No ☐

If yes, furnish the following information:

Name Position Date Connection Ended  
 As an international law firm with more than 500 partners, Bryan Cave Leighton Paisner LLP, as with all similarly sized law firms, regularly adds new partners. Similarly, partners routinely leave Bryan Cave Leighton Paisner LLP for a variety of reasons. To list all such partners would be unnecessarily burdensome since none of them was involved in any way with any activity subject to FARA. On December 20, 2018, Bryan Cave Leighton Paisner announced changes to its governing Board that will become effective January 1, 2019. Please see Attachment A for the current list of board members.

## (b) Have any persons become partners, officers, directors or similar officials during this 6 month reporting period?

Yes ☒No ☐

If yes, furnish the following information:

Name Residence Address Citizenship Position Date Assumed

See response to 4(a).

## 5. (a) Has any person named in Item 4(b) rendered services directly in furtherance of the interests of any foreign principal?

Yes ☐No ☒

If yes, identify each such person and describe the service rendered.

(b) During this six month reporting period, has the registrant hired as employees or in any other capacity, any persons who rendered or will render services to the registrant directly in furtherance of the interests of any foreign principal(s) in other than a clerical or secretarial, or in a related or similar capacity? Yes ☐ No ☒

Name Residence Address Citizenship Position Date Assumed

(c) Have any employees or individuals, who have filed a short form registration statement, terminated their employment or connection with the registrant during this 6 month reporting period? Yes ☐ No ☒

If yes, furnish the following information:

Name Position or Connection Date Terminated

(d) Have any employees or individuals, who have filed a short form registration statement, terminated their connection with any foreign principal during this 6 month reporting period? Yes ☐ No ☒

If yes, furnish the following information:

Name Position or Connection Foreign Principal Date Terminated

## 6. Have short form registration statements been filed by all of the persons named in Items 5(a) and 5(b) of the supplemental statement?

Yes ☐No ☐

If no, list names of persons who have not filed the required statement.

N/A

**II - FOREIGN PRINCIPAL**

7. Has your connection with any foreign principal ended during this 6 month reporting period? Yes ☐ No ☒

If yes, furnish the following information:

Foreign Principal

Date of Termination

8. Have you acquired any new foreign principal(s)<sup>2</sup> during this 6 month reporting period? Yes ☐ No ☒

If yes, furnish the following information:

Name and Address of Foreign Principal(s)

Date Acquired

9. In addition to those named in Items 7 and 8, if any, list foreign principal(s)<sup>2</sup> whom you continued to represent during the 6 month reporting period.

Gabonese Republic

10. (a) Have you filed exhibits for the newly acquired foreign principal(s), if any, listed in Item 8?

Exhibit A<sup>3</sup> Yes ☐ No ☐

Exhibit B<sup>4</sup> Yes ☐ No ☐

If no, please attach the required exhibit.

- (b) Have there been any changes in the Exhibits A and B previously filed for any foreign principal whom you represented during this six month period? Yes ☐ No ☒

If yes, have you filed an amendment to these exhibits? Yes ☐ No ☐

If no, please attach the required amendment.

<sup>2</sup> The term "foreign principal" includes, in addition to those defined in Section 1(b) of the Act, an individual organization any of whose activities are directly or indirectly supervised, directed, controlled, financed, or subsidized in whole or in major part by a foreign government, foreign political party, foreign organization or foreign individual. (See Rule 100(a) (9)). A registrant who represents more than one foreign principal is required to list in the statements he files under the Act only those principals for whom he is not entitled to claim exemption under Section 3 of the Act. (See Rule 208.)

<sup>3</sup> The Exhibit A, which is filed on Form NSD-3, sets forth the information required to be disclosed concerning each foreign principal.

<sup>4</sup> The Exhibit B, which is filed on Form NSD-4, sets forth the information concerning the agreement or understanding between the registrant and the foreign principal.

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**III - ACTIVITIES**

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11. During this 6 month reporting period, have you engaged in any activities for or rendered any services to any foreign principal named in Items 7, 8, or 9 of this statement? Yes ☐ No ☒

If yes, identify each foreign principal and describe in full detail your activities and services:

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12. During this 6 month reporting period, have you on behalf of any foreign principal engaged in political activity<sup>5</sup> as defined below? Yes ☐ No ☒

If yes, identify each such foreign principal and describe in full detail all such political activity, indicating, among other things, the relations, interests and policies sought to be influenced and the means employed to achieve this purpose. If the registrant arranged, sponsored or delivered speeches, lectures or radio and TV broadcasts, give details as to dates, places of delivery, names of speakers and subject matter.

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13. In addition to the above described activities, if any, have you engaged in activity on your own behalf which benefits your foreign principal(s)? Yes ☐ No ☒

If yes, describe fully.

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<sup>5</sup> "Political activity," as defined in Section 1(e) of the Act, means any activity that the person engaging in believes will, or that the person intends to, in any way influence any agency or official of the Government of the United States or any section of the public within the United States with reference to formulating, adopting or changing the domestic or foreign policies of the United States or with reference to political or public interests, policies, or relations of a government of a foreign country or a foreign political party.

**IV - FINANCIAL INFORMATION****14. (a) RECEIPTS-MONIES**

During this 6 month reporting period, have you received from any foreign principal named in Items 7, 8, or 9 of this statement, or from any other source, for or in the interests of any such foreign principal, any contributions, income or money either as compensation or otherwise? Yes ☐ No ☒

If no, explain why.

Bryan Cave Leighton Paisner is actively seeking to obtain payment in full for our services from Gabon. Pursuant to the section of our agreement titled Arbitration of Dispute, Bryan Cave Leighton Paisner has filed for arbitration with the D.C. Attorney Client Arbitration Board. No new payments were received from Gabon during the reporting period, and notably not since May 26, 2016.

If yes, set forth below in the required detail and separately for each foreign principal an account of such monies.<sup>6</sup>

Date	From Whom	Purpose	Amount
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Total

**(b) RECEIPTS - FUNDRAISING CAMPAIGN**

During this 6 month reporting period, have you received, as part of a fundraising campaign<sup>7</sup>, any money on behalf of any foreign principal named in Items 7, 8, or 9 of this statement? Yes ☐ No ☒

If yes, have you filed an Exhibit D<sup>8</sup> to your registration? Yes ☐ No ☐

If yes, indicate the date the Exhibit D was filed. Date \_\_\_\_\_

**(c) RECEIPTS-THINGS OF VALUE**

During this 6 month reporting period, have you received any thing of value<sup>9</sup> other than money from any foreign principal named in Items 7, 8, or 9 of this statement, or from any other source, for or in the interests of any such foreign principal?

Yes ☐ No ☒

If yes, furnish the following information:

Foreign Principal	Date Received	Thing of Value	Purpose
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<sup>6, 7</sup> A registrant is required to file an Exhibit D if he collects or receives contributions, loans, moneys, or other things of value for a foreign principal, as part of a fundraising campaign. (See Rule 201(e)).

<sup>8</sup> An Exhibit D, for which no printed form is provided, sets forth an account of money collected or received as a result of a fundraising campaign and transmitted for a foreign principal.

<sup>9</sup> Things of value include but are not limited to gifts, interest free loans, expense free travel, favored stock purchases, exclusive rights, favored treatment over competitors, "kickbacks," and the like.

**15. (a) DISBURSEMENTS-MONIES**

During this 6 month reporting period, have you

(1) disbursed or expended monies in connection with activity on behalf of any foreign principal named in Items 7, 8, or 9 of this statement? Yes ☒ No ☐(2) transmitted monies to any such foreign principal? Yes ☐ No ☒

If no, explain in full detail why there were no disbursements made on behalf of any foreign principal.

If yes, set forth below in the required detail and separately for each foreign principal an account of such monies, including monies transmitted, if any, to each foreign principal.

Date	To Whom	Purpose	Amount
7/29/2018	Department of Justice	Payment of FARA filing fee	\$305.00

\$305.00

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Total

**(b) DISBURSEMENTS-THINGS OF VALUE**

During this 6 month reporting period, have you disposed of anything of value<sup>10</sup> other than money in furtherance of or in connection with activities on behalf of any foreign principal named in Items 7, 8, or 9 of this statement?

Yes ☐No ☒

If yes, furnish the following information:

Date	Recipient	Foreign Principal	Thing of Value	Purpose
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**(c) DISBURSEMENTS-POLITICAL CONTRIBUTIONS**

During this 6 month reporting period, have you from your own funds and on your own behalf either directly or through any other person, made any contributions of money or other things of value<sup>11</sup> in connection with an election to any political office, or in connection with any primary election, convention, or caucus held to select candidates for political office?

Yes ☒No ☐

If yes, furnish the following information:

Date	Amount or Thing of Value	Political Organization or Candidate	Location of Event
	See Attachment B		

<sup>10, 11</sup> Things of value include but are not limited to gifts, interest free loans, expense free travel, favored stock purchases, exclusive rights, favored treatment over competitors, "kickbacks," and the like.

**V - INFORMATIONAL MATERIALS**

16. (a) During this 6 month reporting period, did you prepare, disseminate or cause to be disseminated any informational materials?<sup>12</sup>  
 Yes ☐ No ☒

If Yes, go to Item 17.

- (b) If you answered No to Item 16(a), do you disseminate any material in connection with your registration?  
 Yes ☐ No ☐

If Yes, please forward the materials disseminated during the six month period to the Registration Unit for review.

17. Identify each such foreign principal.

18. During this 6 month reporting period, has any foreign principal established a budget or allocated a specified sum of money to finance your activities in preparing or disseminating informational materials? Yes ☐ No ☒

If yes, identify each such foreign principal, specify amount, and indicate for what period of time.

19. During this 6 month reporting period, did your activities in preparing, disseminating or causing the dissemination of informational materials include the use of any of the following:

- ☐ Radio or TV broadcasts ☐ Magazine or newspaper ☐ Motion picture films ☐ Letters or telegrams  
☐ Advertising campaigns ☐ Press releases ☐ Pamphlets or other publications ☐ Lectures or speeches  
☐ Other (specify) \_\_\_\_\_

**Electronic Communications**

- ☐ Email  
☐ Website URL(s): \_\_\_\_\_  
☐ Social media websites URL(s): \_\_\_\_\_  
☐ Other (specify) \_\_\_\_\_

20. During this 6 month reporting period, did you disseminate or cause to be disseminated informational materials among any of the following groups:

- ☐ Public officials ☐ Newspapers ☐ Libraries  
☐ Legislators ☐ Editors ☐ Educational institutions  
☐ Government agencies ☐ Civic groups or associations ☐ Nationality groups  
☐ Other (specify) \_\_\_\_\_

21. What language was used in the informational materials:

- ☐ English ☐ Other (specify) \_\_\_\_\_

22. Did you file with the Registration Unit, U.S. Department of Justice a copy of each item of such informational materials disseminated or caused to be disseminated during this 6 month reporting period? Yes ☐ No ☐

23. Did you label each item of such informational materials with the statement required by Section 4(b) of the Act? Yes ☐ No ☐

<sup>12</sup> The term informational materials includes any oral, visual, graphic, written, or pictorial information or matter of any kind, including that published by means of advertising, books, periodicals, newspapers, lectures, broadcasts, motion pictures, or any means or instrumentality of interstate or foreign commerce or otherwise. Informational materials disseminated by an agent of a foreign principal as part of an activity in itself exempt from registration, or an activity which by itself would not require registration, need not be filed pursuant to Section 4(b) of the Act.

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**VI - EXECUTION**

In accordance with 28 U.S.C. § 1746, the undersigned swear(s) or affirm(s) under penalty of perjury that he/she has (they have) read the information set forth in this registration statement and the attached exhibits and that he/she is (they are) familiar with the contents thereof and that such contents are in their entirety true and accurate to the best of his/her (their) knowledge and belief, except that the undersigned make(s) no representation as to truth or accuracy of the information contained in the attached Short Form Registration Statement(s), if any, insofar as such information is not within his/her (their) personal knowledge.

(Date of signature)

(Print or type name under each signature or provide electronic signature<sup>13</sup>)01/11/19  
LaDawn Naegle, Office Managing Partner

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<sup>13</sup> This statement shall be signed by the individual agent, if the registrant is an individual, or by a majority of those partners, officers, directors or persons performing similar functions, if the registrant is an organization, except that the organization can, by power of attorney, authorize one or more individuals to execute this statement on its behalf.

**Attachment A**

List of partners, officers, directors, or persons performing the functions of an officer or director of the registrant.

<u>Firm Board</u>			
<u>Name</u>	<u>Residence</u>	<u>Position</u>	<u>Nationality</u>
Steven Baumer	St. Louis	Board Member	U.S.
Elizabeth Bradley	London	Board Member	U.K.
George Chen	Phoenix	Board Member	U.S.
Russell Clifford	London	Board Member	U.K.
Oliver Glynn-Jones	London	Board Member	U.K.
Antony Grossman	London	Board Member	U.K.
Robert Hoffman	Kansas City	Board Member	U.S.
James Knox	London	Board Member	U.K.
Robert MacGregor	London	Board Member	U.K.
Lee Marshall	San Francisco	Board Member	U.S.
Lisa Mayhew	London	Co-Chair of Firm, Management Committee Member	U.K.
Becky Nelson	St. Louis	Board Member	U.S.
Therese Pritchard	Washington, DC	Co-Chair of Firm, Management Committee Member	U.S.
Katie Schwarting	Charlotte	Board Member	U.S.
Cliff Stricklin	Denver	Board Member	U.S.
Ian Weiskopf	New York	Board Member	U.S.
Gregory Worthy	Atlanta	Board Member	U.S.

**Attachment B**

<u>Registrant</u>	<u>Date</u>	<u>Amount or Thing of Value</u>	<u>Political Organization or Candidate</u>
Bryan Cave LLP Political Action Committee	\$250	8/1/2018	JASON SMITH FOR CONGRESS
	\$250	8/1/2018	VALADAO FOR CONGRESS
	\$250	10/4/2018	WALORSKI FOR CONGRESS INC
	\$500	9/6/2018	BLAINE FOR CONGRESS
	\$500	10/4/2018	FRIENDS OF ERIK PAULSEN
	\$500	10/25/2018	HANDEL FOR CONGRESS, INC.
	\$1,000	8/1/2018	CLAY JR. FOR CONGRESS
	\$1,000	8/1/2018	THE HAWKEYE PAC
	\$1,000	9/6/2018	RODNEY FOR CONGRESS
	\$1,000	10/4/2018	COMSTOCK FOR CONGRESS
	\$1,000	10/4/2018	RODNEY FOR CONGRESS
	\$1,000	10/4/2018	SHAHEEN FOR SENATE
	\$1,000	10/25/2018	CLAY JR. FOR CONGRESS
	\$1,000	10/25/2018	COMMITTEE TO RE-ELECT LINDA SANCHEZ
	\$1,000	10/25/2018	FRIENDS OF SHERROD BROWN
	\$1,000	10/25/2018	GEORGIAN FOR ISAKSON
	\$1,000	10/25/2018	GREG FOR MONTANA
	\$1,000	10/25/2018	MARTIN HEINRICH FOR SENATE
	\$1,000	10/25/2018	MENENDEZ FOR SENATE
	\$1,000	10/25/2018	PEOPLE FOR BEN
	\$1,000	10/25/2018	PERDUE FOR SENATE
	\$1,500	8/1/2018	HUFFMAN FOR CONGRESS
	\$2,500	8/1/2018	MATSUI FOR CONGRESS
	\$2,500	10/4/2018	PALLONE FOR CONGRESS

<u>Registrant</u>	<u>Date</u>	<u>Amount or Thing of Value</u>	<u>Political Organization or Candidate</u>
Bryan Cave LLP Political Action Committee	\$2,500	10/4/2018	PASCARELL FOR CONGRESS
	\$2,500	10/4/2018	TED CRUZ VICTORY COMMITTEE
	\$2,500	10/4/2018	TEXANS FOR SENATOR JOHN CORNYN INC
	\$2,500	10/4/2018	VIRGINIA FOXX FOR CONGRESS
	\$2,500	10/25/2018	BILL NELSON FOR U.S. SENATE
	\$2,500	10/25/2018	FRIENDS OF JIM CLYBURN
	\$2,500	10/25/2018	MONTANANS FOR TESTER
	\$2,500	10/25/2018	PALLONE FOR CONGRESS
	\$2,500	10/25/2018	TAMMY BALDWIN FOR SENATE
	\$2,500	10/25/2018	WICKER FOR SENATE
	\$3,500	8/1/2018	HEARTLAND VALUES PAC
	\$3,500	8/1/2018	TRUE NORTH PAC
	\$3,500	10/25/2018	DONNELLY FOR INDIANA
	\$5,000	10/4/2018	BIG SKY OPPORTUNITY PAC
	\$5,000	10/4/2018	NATIONAL REPUBLICAN SENATORIAL COMMITTEE
	\$5,000	10/25/2018	CONGRESSIONAL BLACK CAUCUS PAC
	\$5,000	10/25/2018	DEMOCRATIC SENATORIAL CAMPAIGN COMMITTEE
	\$5,000	10/25/2018	TED CRUZ VICTORY COMMITTEE
Matt Jessee	\$250	9/4/2018	JOSH HAWLEY FOR SENATE
	\$250	10/17/2018	JOSH HAWLEY FOR SENATE
Dave Russell	\$250	7/30/2018	ROSENDALE FOR MONTANA